

REMARKS/ARGUMENTS

Favorable reconsideration of this application, as presently amended and in light of the following discussion, is respectfully requested.

Claims 16-20 and 25-35 are currently pending. Claims 16, 25, 26, 27, and 28 are amended, and new claims 34 and 35 are added, by the foregoing amendment. These claim changes, including new claims 34 and 35, are supported in Applicants' originally-filed disclosure at least at Figures 24 and 25, and from page 77, line 14, to page 78, line 9. No new subject matter is introduced by these claim amendments.

In the Office Action, claims 16-20 and 25-33 were rejected under 35 U.S.C. § 102(e) as anticipated by Moon et al. (U.S. Patent No. 6,721,493; hereinafter "Moon"). Claims 16 and 25-33 were rejected under 35 U.S.C. § 102(e) as anticipated by Toyoda et al. (U.S. Patent Application No. 2002/0054049; hereinafter "Toyoda"). Claims 16-20 and 25-33 were rejected under 35 U.S.C. § 102(e) as anticipated by Parulski (U.S. Patent No. 5,555,098).

Regarding Moon, Applicants respectfully submit that this reference fails to anticipate claims 26-20 and 25-33. For example, amended claim 16 recites, among other features:

the still picture cell information includes a field including still picture cell general information, and a plurality of fields including still picture cell entry point information,

the still picture cell general information includes number information of the still picture cell entry point information fields, and

the number information is stored in a portion of the still picture cell information that is different from a portion of the still picture cell information in which said plurality of fields including the still picture cell entry point information are stored.

Referring to the non-limiting examples shown in Figures 24 and 25, a still picture cell information S\_CI includes a field for storing still picture cell general information S\_C\_GI and multiple fields for storing still picture cell entry point information S\_C\_EPI#1-#n. The

contents of S\_C\_GI are depicted in Applicants' Figure 25, which illustrates that a number of cell entry point information C\_EPI\_Ns is stored in S\_C\_GI. Because the number information C\_EPI\_Ns is stored in a different portion in S\_CI than the S\_C\_EPI#1-3n, a player/recorder can retrieve the number information C\_EPI\_Ns without having to access any of the S\_C\_EPI #1-#n.

Moon does not teach each and every feature of amended claim 16. Moon depicts a data structure in which general information for still picture groups are stored in a still picture information field.<sup>1</sup> Each still picture group information includes still picture group general information, still picture attribute information, and a still picture map table.<sup>2</sup>

However, Moon does not disclose still picture cell information, still picture cell general information, and number information, as recited in amended claim 16. Specifically, the data structure described in Moon does not include a still picture cell information including "a field including still picture cell general information, and a plurality of fields including still picture cell entry point information," as recited in amended claim 16. Further, Moon does not disclose still picture cell general information including number information stored in "a portion of the still picture cell information that is different from the portion of the still picture cell information in which said plurality of fields with a still picture cell entry point information are stored." Moon fails to teach each and every feature of claim 16 and, as such, fails to anticipate amended claim 16.

Accordingly, Applicants respectfully submit that amended claim 16 is patentable over Moon and request reconsideration and withdrawal of the rejection of claim 16 under 35 U.S.C. § 102(e) citing Moon. Claims 17-20 and 29 depend from independent claim 16 and are patentable over Moon for at least the reasons discussed above. Further, each of claims 25-28, 34, and 35 recite subject matter substantially similar to the features of amended claim

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<sup>1</sup> See Moon at Figure 2.

<sup>2</sup> See Id. at Figure 7.

16 discussed above and are also patentable over Moon for at least the reasons discussed above.

Applicants respectfully submit that Toyoda fails to anticipate claims 16 and 25-33. Toyoda discloses a data structure in which multiple playback pointers are associated with multiple thumbnail images recorded on a magnetic disk.<sup>3</sup> However, Toyoda does not disclose a still picture cell information including "a field including still picture cell general information, and a plurality of fields including still picture cell entry point information," as recited in amended claim 16. Further, Toyoda does not disclose still picture cell general information including number information that is stored in "a portion of the still picture cell information that is different from a portion of the still picture cell information in which said plurality of fields including the still picture cell entry point information are stored." Toyoda fails to disclose each and every feature of amended claim 16 and, as such, fails to anticipate amended claim 16.

Accordingly, Applicants respectfully submit that amended claim 16 patentably defines over Toyoda and request reconsideration and withdrawal of the rejection of claim 16 under 35 U.S.C. § 102(e) citing Toyoda. Claims 17-20 and claim 29 depend from independent claim 16 and patentably define over Toyoda for at least the reasons discussed. Claims 25-35 recite features substantially similar to those features discussed above with respect to amended claim 16 and are also patentable over Toyoda for at least the reasons discussed above.

Applicants respectfully submit that Parulski also fails to anticipate claims 16-20 and 25-33. For example, Parulski discloses a presentation sequences file 100 that stores a number of locations 122, 126, etc., which each store a disk image number corresponding to an

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<sup>3</sup> See Toyoda at Figure 15 and paragraph 0094.

image.<sup>4</sup> However, Parulski is silent as to still picture cell information including "a field including still picture cell general information, and a plurality of fields including still picture cell entry point information," as recited in amended claim 16. In addition, Parulski does not disclose still picture cell information including number information that are stored in "a portion of the still picture cell information that is different from a portion of the still picture cell information in which said plurality of fields including the still picture cell entry point information are stored." Thus, Parulski fails to anticipate amended claim 16.

Accordingly, Applicants respectfully submit that amended claim 16 patentably defines over Parulski. Applicants respectfully request reconsideration and withdrawal of the rejection of claim 16 under 35 U.S.C. § 102(e) citing Parulski. Claims 17-20 and 29 depend from independent claim 16 and are also patentable over Parulski for at least the reasons discussed above. Further, claims 25-35 recite features substantially similar to those discussed above with respect to amended claim 16, and Applicants submit that these claims also patentably define over Parulski for at least the reasons discussed above.

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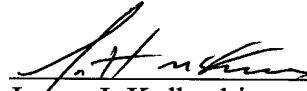
<sup>4</sup> See Parulski at Figure 3 and column 7, lines 13-32.

Application No. 10/076,277  
Reply to Office Action of April 29, 2004

Consequently, in light of the above discussion and in view of the present amendment, the present application is believed to be in condition for allowance and an early and favorable action to that effect is respectfully requested.

Respectfully submitted,

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